

# EXHIBIT 1

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

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JOHNSON, et al.,                   :  
                  Plaintiffs,       :  
          v.                        : Civil Action No.:  
CALLANEN, et al.,                : 5:22-cv-00409-XR  
                  Defendants.       :

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Deposition of BEXAR COUNTY by and through it's  
corporate representative JACQUELYN CALLANEN and in  
her individual capacity.

(CONDUCTED VIRTUALLY)

Thursday, December 15th, 2022  
10:30 a.m.

Job No.: 474460  
Pages: 1 - 219  
Reported By: Jessica Gibson

1 stipulated because, again, we've been using it for  
2 the military all over the world and they've been  
3 reading their ballots, okay?

4 There may have been some confusion on the  
5 difference between a screen reader and fillable  
6 and accessible.

7 Q Okay. Understood. But your understanding  
8 of -- and, by you, I mean the county's  
9 understanding of accessible is -- are you saying  
10 that you are conflating fillable with accessible  
11 to a screen reader; am I understanding that right?

12 A Yes.

13 Q Okay.

14 A I think so, yes.

15 Q Okay. All right. Per paragraph 15, which  
16 says: The electronic ballots provided through the  
17 MOVE Edge system are fillable PDFs that are  
18 accessible to screen reader software.

19 Same question as with paragraph 12, what  
20 was the basis for making that stipulation?

21 A Again, I would say my understanding is  
22 that somebody's looking at a screen. They're

1 filling it in so that it's screen-reader  
2 accessible.

3 Q Okay.

4 A Not a definition as opposed for -- or  
5 excuse me -- for a disability.

6 Q Okay. Are you familiar with screen reader  
7 software at all; like, Jaws, NDBA, anything  
8 like --

9 A No.

10 Q Okay.

11 A What are they called?

12 Q Well, there's different names for all of  
13 them. And honestly, like, (indiscernible) might  
14 be better versed in the range of them than I am.  
15 But they're, like, essentially devices that read  
16 the screen to an individual who is blind and has a  
17 vision impairment and isn't able to, you know,  
18 look at the screen and read it themselves.

19 A Right.

20 Q So you're not familiar with that  
21 technology or its interaction with any of the  
22 ballot forms that we have looked at today,

1 correct?

2 A Correct. The technology sounds amazing,  
3 yeah.

4 Q Okay. Is the county aware that there are  
5 companies out there in the same space as MOVE Edge  
6 who are able to take PDF ballots like what we've  
7 looked at today and make that accessible to screen  
8 reader technology?

9 A No, I'm not. But I think I just heard you  
10 list some. You said something -- Democracy Live,  
11 and, I think, that other list that I was not  
12 familiar with.

13 Q Okay. So when it comes to -- you  
14 mentioned that if the county wanted to talk to  
15 someone at MOVE Edge about making the ballots  
16 accessible, like, to a screen reader, they would  
17 reach out to Mr. Gonzalez, correct?

18 A Correct.

19 Q And if say, for instance, he told you,  
20 hey, we don't have the tech for that. We can't do  
21 it; could the county, when that contract comes up  
22 for renewal, exit that contract and instead look

1 for bids from another one of these companies that  
2 I've named earlier that could provide this  
3 technology or ballots with this accessible format  
4 for screen readers?

5 A I'm sure. Again, given the limitations on  
6 timing that we had talked about previously.

7 Q Okay. But if this was something that  
8 happened in the next, like, few months or so --  
9 because you said the six-month lead time is what  
10 the purchasing department requires -- that that is  
11 a RFP that your department could put in to  
12 purchasing?

13 A Right. That's what we talked about  
14 before, yeah.

15 Q Okay. And then purchasing, in turn, could  
16 solicit bids from companies similar to MOVE Edge,  
17 but with the capability to provide screen-reader  
18 accessible ballots electronically?

19 A Correct.

20 Q Okay. If you could just turn to Exhibit  
21 13.

22 (Exhibit 13, previously marked, was

## 1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2 I, Jessica Gibson, the officer before whom  
3 the foregoing deposition was taken, do hereby  
4 certify that said proceedings were electronically  
5 recorded by me; and that I am neither counsel for,  
6 related to, nor employed by any of the parties to  
7 this case and have no interest, financial or  
8 otherwise, in its outcome.

9 IN WITNESS WHEREOF, I have hereunto set my  
10 hand and affixed my notarial seal this 21th day of  
11 December, 2022.

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14 Jessica Gibson, Notary Public  
15 For the Commonwealth of Virginia  
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